

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN MICHAEL VREELAND

MAGISTRATE CASE NO.

COMPLAINT FOR VIOLATION OF

Title 18, U.S.C., Section 2113  
Bank Robbery

FILED  
2008 JUN -6 AM 11:19

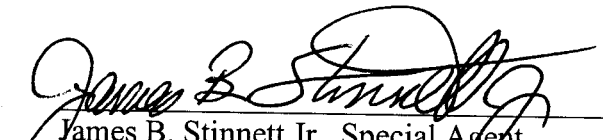
KNY  
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The undersigned complainant, being duly sworn, states:

Count 1

On June 2, 2008, within the Southern District of California, defendant JOHN MICHAEL VREELAND, by force, violence, and by intimidation, did unlawfully take from the person and presence of an employees of California Bank and Trust, at 525 B Street, Suite 100, San Diego, California, \$480 in United States currency belonging to and in the care, custody, control, management and possession of the Pacific Trust Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

And the complainant states that this complaint is based on the attached affidavit which is incorporated herein by reference.

  
James B. Stinnett Jr., Special Agent  
Federal Bureau of Investigation

SWORN TO ME AND SUBSCRIBED IN MY PRESENCE THIS 6th DAY OF JUNE 2008.

  
UNITED STATES MAGISTRATE JUDGE

CONTINUATION OF COMPLAINT:  
UNITED STATES v. JOHN MICHAEL VREELAND

AFFIDAVIT

I, James B. Stinnett Jr., Special Agent (SA) of the Federal Bureau of Investigation (FBI), being duly sworn, depose and say:

1. I am currently assigned to violent crimes investigations in the San Diego Field Division of the FBI. I have been a SA with the FBI for approximately three and a half years. Prior to joining the FBI, I was employed as a Police Officer in Johnson City, Tennessee for approximately eight years. The information contained in this affidavit is based upon my personal knowledge and on the information I have learned from reviewing official reports and speaking with other local and federal law enforcement officers.

2. This affidavit is in support of a Complaint for JOHN MICHAEL VREELAND, date of birth January 17, 1953, for violation of Title 18 of the United States Code, Section 2113 (a), Bank Robbery.

3. On Monday June 2, 2008, at approximately 12:00 p.m., the affiant responded to the report of a robbery at the California Bank and Trust, 525 B Street, Suite 100, San Diego, California.

4. The affiant has interviewed the victim teller from California Bank and Trust, 525 B Street, Suite 100, San Diego, California, who advised as follows:

a. On June 2, 2008, as the teller was working an unknown white male entered California Bank and Trust, 525 B Street, Suite 100, San Diego, California. The teller greeted the unknown white male, who was carrying a black backpack. The unknown white male stated, "Stay calm, this is a robbery. Give me all your large bills from your top drawer."

b. The teller attempted to comply with the robber's demands, but realized that she did not have any large bills in her top drawer. The teller explained this to the robber, who then stated, "Give me all your \$20's and count them out to me like a regular customer." The teller immediately began counting \$20 bills out to the robber. Upon reaching \$180 the robber stated, "That's enough", and grabbed all the money the teller had counted and was holding. The robber then exited California Bank and Trust, 525 B Street, Suite 100, San Diego, California, through the only entrance/exit.

5. On June 5, 2008, the affiant reviewed reports of Officers of the San Diego Police Department which advised that defendant, VREELAND, had entered the San Diego Police Department Headquarters, 1401 Broadway, San Diego, California, and explained that he wanted to turn himself in for the June 2, 2008, robbery of California Bank and Trust, 525 B Street, San Diego, California.

a. VREELAND, who matched the description of the robber was taken into custody and escorted upstairs for an interview. After VREELAND was advised of his constitutional Miranda rights, VREELAND stated that he understood those rights and voluntarily signed the FBI Advice of Rights form indicating he was willing to answer questions without an attorney present. VREELAND voluntarily advised as follows:

b. VREELAND entered California Bank and Trust, 525 B Street, San Diego, California, on Monday, June 2, 2008, while wearing the same clothing that he was wearing during the interview. VREELAND approached a teller at a middle window, leaned on the teller counter, and stated, "You're being robbed. Don't signal anybody. Give me the \$100's and \$50's from the top drawer."

c. VREELAND thought the teller was reaching for a dye pack after she opened her drawer and he told her, "No." The teller then took out a loose stack of \$20 bills, which she began counting out on the counter. VREELAND took the \$20 bills from the teller and exited California Bank and Trust, 525 B Street, San Diego, California, with \$480.

d. After exiting California Bank and Trust, 525 B Street, San Diego, California, VREELAND escaped and took a bus trip to San Fransico, California and back to San Diego, California. VREELAND spent the \$480 on food, the bus tickets, a hotel stay in Los Angeles, California, and a hotel stay in San Diego, California.

e. VREELAND was shown a surveillance photograph of the robber from the June 2, 2008, robbery of California Bank and Trust, 525 B Street, Suite 100, San Diego, California, and asked who was depicted in the photograph. VREELAND advised the individual depicted in the surveillance photograph was himself. VREELAND then signed and dated the photograph.

6. VREELAND is described as follows:

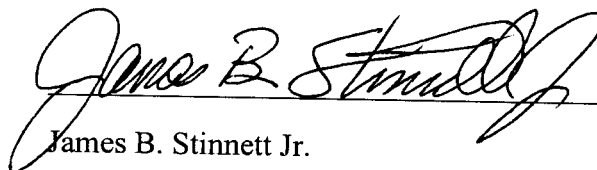
Name:	JOHN MICHAEL VREELAND
Race:	White
Sex:	Male
Date of Birth:	January 17, 1953

Social Security#: XXX-XX-1562  
Height: 5'11"  
Weight: 230 pounds  
Build: Heavy  
Hair: Bald  
Residence: 4540 Ingraham  
San Diego, California

7. The affiant has confirmed that the deposits of the California Bank and Trust, 525 B Street, Suite 100, San Diego, California, were insured by the Federal Deposit Insurance Corporation (FDIC) at the time of the bank robbery on June 2, 2008. The California Bank and Trust, 525 B Street, Suite 100, San Diego, California, incurred a loss of \$480 as a result of that bank robbery.

8. The foregoing information and evidence indicates that JOHN MICHAEL VREELAND, on June 2, 2008, did by force take from the person and presence of employees of California Bank and Trust, 525 B Street, Suite 100, San Diego, California, the deposits of which were then insured by the FDIC, approximately \$480 in United States currency, belonging to and in the care, custody, control, management, and possession of such bank.

The foregoing is true and correct to the best of my information and belief.



James B. Stinnett Jr.  
Special Agent, FBI

Sworn to before me and subscribed in my presence this 6th day of June, 2008, at 1105 a.m. p.m.

  
United States Magistrate Judge